

January 11, 2006

Mr. Matt Thompson
California Regional Water Quality
Control Board, Central Coast Region
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401-7906

Mr. Gary Sheth
U.S. Environmental Protection Agency,
Region IX, WTR-5
75 Hawthorne Street
San Francisco, CA 94105-3901

Subject: Comments on the Proposed Waste Discharge Requirements (Order No. R3-2006-0019, NPDES Permit No. CA0047881) for the Morro Bay/ Cayucos Wastewater Treatment Plant

Dear Mr. Thompson and Mr. Sheth,

Thank you for the opportunity to comment on the proposed discharge permit¹ for the Morro Bay - Cayucos (MBCSD) Wastewater Treatment Plant. Our comments are based on a comprehensive review of the proposed permit that was conducted by MBCSD staff and their consultant, Marine Research Specialists.

Our general comments are provided below. More detailed comments are provided in three separate attachments covering different aspects of the discharge permit.

- Attachment A consists of a letter report from Marine Research Specialists detailing recommended revisions to the proposed Waste Discharge Requirements (WDRs) and the Fact Sheet, along with the technical justification for those revisions.
- Attachment B documents corrections for minor typographical errors, and other inaccuracies and discrepancies that are fairly self-evident in the draft permit.

¹ US Environmental Protection Agency Region 9 (USEPA) and the California Regional Water Quality Control Board, Central Coast Region (RWQCB). 2005. *Joint Notice of Proposed Actions on Reissuance of Waste Discharge Requirements [NPDES Permit] to Discharge to the Pacific Ocean for the City of Morro Bay and Cayucos Sanitary District San Luis Obispo County*. Public Notice No. RB3-2006-0019, NPDES No. CA0047881. 19 December.

MBCSD comments concerning the Collection System Requirements and the Wastewater Collection System Management Plan will be submitted under a separate cover.

General Comments

Despite our extensive detailed comments on the permit itself, we are immensely gratified by the cooperative effort between the staffs of Morro Bay, Cayucos, RWQCB,² and the EPA³ throughout the permit process. Because of our mutual interest in a future upgrade of the treatment plant, development of the permit was an unusually long and involved. The staffs of the four agencies should be applauded for promptly and effectively negotiating a mutually acceptable settlement agreement that identifies a reasonable conversion schedule for plant upgrades capable of meeting full secondary treatment requirements. All agency staffs worked cooperatively to establish the conversion schedule based on facility needs identification and analysis for the two respective communities, extensive public input and dialogue, as well as the best professional judgment of a respected environmental engineering firm. MBCSD is strongly committed to the schedule outlined in the settlement agreement and feels that it accurately reflects a continued commitment to protecting the receiving waters and local ecology. MBCSD looks forward to working with RWQCB and EPA staff during the implementation of the settlement agreement, and to RWQCB assistance in procuring funding for the upgrade project that will be the largest expenditure in the history of either Cayucos or Morro Bay. It is our hope that we can continue to work cooperatively by redirecting much of the monitoring and reporting costs toward our mutually agreed upon solution. MBCSD thanks both RWQCB and EPA staff for their cooperation and patience during this process.

During the upgrade process, re-issuing a 301(h)-modified discharge permits to MBCSD is an environmentally sound decision supported by two decades of intensive monitoring. During that time, there have been no perceptible impacts from the MBCSD discharge. There are four major aspects of the MBCSD discharge that account for the lack of impacts.

- 1) Discharge volumes are small, only about 1 MGD;
- 2) Effluent solids concentrations are low, and close to secondary treatment standards;
- 3) The discharge is far removed (2700 ft) from the shoreline where the high-energy open-ocean environment rapidly disperses effluent beyond recognition within 50 ft of the diffuser structure; and
- 4) Effluent contaminant levels are low because domestic wastewater sources dominate in a service area devoid of heavy industry.

During the upgrade of the MBCSD plant, the Regional Board and EPA decisionmakers can take comfort in the fact that there will be no tangible impact on the marine environment, or its beneficial uses, by allowing the MBCSD to continue operating under a 301(h)-modified permit. The principal reason for this is that this partial-secondary treatment plant is far below capacity, so nearly all of the effluent is already treated to secondary levels. In addition, the discharge will not materially change during the upgrade period because population growth in the service area is restricted by legislation. Consequently, the discharge volume will remain far below plant capacity and nearly all of the wastewater will continue to be treated to secondary levels. In addition, the intensive monitoring required as part of the 301(h) section of the Clean Water Act is “...among the most comprehensive of all municipal ocean discharges of less than

² The California Regional Water Quality Control Board, Central Coast Region

³ US Environmental Protection Agency Region 9

5 MGD in California.”⁴ Consequently, the monitoring program will continue to be capable of quickly identifying any potential future impacts so that corrective action can be implemented in a timely fashion. Because of all these considerations, the Regional Board and EPA can rest assured that their decision to re-issue the 301(h)-modified permit to the MBCSD is based on sound reasoning and solid scientific data.

Your consideration and reasoned response to the MBCSD’s concerns outlined in the attached documents are greatly appreciated. Please don’t hesitate to contact me at (805) 772-6272 with any questions or if you require further information.

Sincerely,

Bruce Keogh
Wastewater Division Manager

cc
Bob Hendrix
City of Morro Bay

Bruce Ambo
City of Morro Bay

Ms. Bonnie Connelly
Cayucos Sanitary District

Dr. Douglas Coats
Marine Research Specialists

Attachments

⁴ Page F-9, of the Proposed NPDES Discharge Permit, Attachment F-Fact Sheet